

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE No. 24-24228-CIV-ALTONAGA

MEGAN PETE,

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,

Defendant.

VERDICT FORM

In answering the following questions and filling out this Verdict Form, you are to follow my Final Instructions and any instructions provided in this Verdict Form. Your answer to each of the following must be unanimous.

We, the jury, unanimously answer the questions submitted to us as follows:

MS. PETE'S CLAIMS

COUNT ONE: DEFAMATION *PER SE*

Question 1: Do you find, by a preponderance of the evidence, that Ms. Cooper is liable to Ms. Pete for defamation *per se* by accusing Ms. Pete of perjury — a felony — by lying under oath in a criminal trial when she asserted that: (1) Ms. Pete was a “non-credible witness”; (2) “I could go down the list of all the different shit that was not true”; and (3) asked “Was Megan Thee Stallion caught trying to deceive the courts again?”

Yes X

No _____

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If your answer to question 1 is "Yes," continue to Question 2, if the answer is "No," proceed to "Count Two: Intentional Infliction of Emotional Distress."

Question 2: Do you find, by a preponderance of the evidence, that Ms. Cooper's defamatory statements caused Ms. Pete actual damages?

Yes X No

Regardless of your answer to question 2 continue to Question 3.

Question 3: During the time period when the statements were made, do you find, by a preponderance of the evidence, that Ms. Cooper provided disinterested and neutral commentary, rather than advocacy for a particular client or personal interest?

Yes No X

Regardless of your answer to question 3 continue to Question 4.

Question 4: During the time period when the statements were made, do you find, by a preponderance of the evidence, that Ms. Cooper regularly disseminated news or information to the public, rather than making an isolated or one-time publication?

Yes X No

Regardless of your answer to question 4 continue to Question 5.

Question 5: During the time period when the statements were made, do you find, by a preponderance of the evidence, that Ms. Cooper impartially disseminated information, rather than acting primarily to promote her own business, products, or services?

Yes No X

Regardless of your answer to question 5 continue to Question 6.

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Question 6: During the time period when the statements were made, do you find, by a preponderance of the evidence, that Ms. Cooper operated for the purpose of informing the public about matters of public concern through news reporting, analysis, or commentary?

Yes X No _____

Regardless of your answer to question 6 continue to Question 7.

Question 7: During the time period when the statements were made, do you find, by a preponderance of the evidence, that Ms. Cooper functioned in a similar manner to traditional news media, such as newspapers, magazines, television, radio, or their online equivalents?

Yes X No _____

Regardless of your answer to question 7 continue to Question 8.

Question 8: Considering your answers to Questions 3 through 7 together, do you find, by a preponderance of the evidence, that Ms. Cooper should be treated as a media defendant with regard to the statements made in this case?

Yes X No _____

Regardless of your answer to question 8, proceed to Count Two: Promotion of an Altered Sexual Depiction.

COUNT TWO: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Question 9: Do you find, by a preponderance of the evidence, that Ms. Cooper intentionally or recklessly engaged in extreme and outrageous conduct toward Ms. Pete?

Yes X No _____

If your answer is "Yes," proceed to the next question. If your answer is "No," skip the remaining question under "Count Three: Promotion of an Altered Sexual Depiction," and proceed to "Damages."

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Question 10: Do you find, by a preponderance of the evidence, that Ms. Pete suffered severe emotional distress as a result of Ms. Cooper's extreme and outrageous conduct?

Yes X

No _____

Regardless of whether your answer is "Yes" or "No," proceed to "Count Three: Promotion of an Altered Sexual Depiction."

COUNT THREE: PROMOTION OF AN ALTERED SEXUAL DEPICTION

Question 11: Do you find, by a preponderance of the evidence, that Ms. Cooper willfully and maliciously promoted, without Ms. Pete's consent, a visual depiction of Ms. Pete that she knew or reasonably should have known was an altered sexual depiction?

Yes X

No _____

DAMAGES

If you answered "Yes" to Questions 1 & 2 in Count One: Defamation Per Se, proceed to the next question. If you answered "No," to Question 1 and "Yes" to the questions in Count II, proceed to Question 13.

Question 12: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper for Defamation *per se*?

Yes X

No _____

If your answer is "Yes," in what amount: \$15,000 /00

If you answered "Yes" to the Questions in Count Two: Intentional Infliction of Emotional Distress, proceed to the next question. If your answered "No," to Question 9 or 10, proceed to Question 14.

Question 13: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper for Intentional Infliction of Emotional Distress?

Yes X

No _____

If your answer is "Yes," in what amount: \$ 0,000 /00

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If you answered "Yes" to the Question in Count Three: Promotion of An Altered Sexual Depiction, proceed to the next question. If you answered "No," to Question 11, proceed to Question 15.

Question 14: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper for Promotion of An Altered Sexual Depiction?

Yes X No _____

If your answer is "Yes," in what amount: \$50,000 /00

If you answered "Yes" to Question 12, proceed to the next question.

Question 15: If you found for Ms. Pete on the defamation claim at Question 1, do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete's defamation claim?

Yes X No _____

If your answer is "Yes," in what amount: \$1,000 /00

Regardless of whether your answer is "Yes" or "No," proceed to the next question.

Question 16: If you found for Ms. Pete on the intentional infliction of emotional distress claim at Questions 9 and 10, do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete's intentional infliction of emotional distress claim?

Yes X No _____

If your answer is "Yes," in what amount: \$1,000 /00

Signed: _____

Jury Foreperson

Dated: _____